

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

LARGE AUDIENCE DISPLAY  
SYSTEMS LLC,

Plaintiff,

vs.

Civil Action No. 2:09-CV-00356

TENNMAN PRODUCTIONS, LLC,  
JUSTIN TIMBERLAKE,  
LOS ANGELES LAKERS, INC.,  
BRITNEY TOURING, INC.,  
BRITNEY SPEARS and  
PUSSYCAT DOLLS, LLC,

JURY TRIAL DEMANDED

Defendants.

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STATE OF CALIFORNIA    )  
                                  ) ss.:  
COUNTY OF \_\_\_\_\_ )

Steve Dixon, being duly sworn, deposes and states:

1. I am a musical concert tour designer and operator. I have been in this business for over 10 years. With respect to the above captioned litigation, I was part of a team of individuals who designed the set and facilitated the logistics for many parts of the Tours for Britney Spears and her production company, Britney Tours LLC (hereinafter collectively referred to as "the BSpears Defendants") and for Justin Timberlake and his production company, Tennman Productions LLC (hereinafter collectively referred to as the "JTimberlake Defendants"). Often herein, I refer to the BSpears Defendants and the JTimberlake Defendants collectively as "the Litigation Defendants." I make this affidavit in support of Defendants' motion to transfer venue to the Central District of California. I have personal knowledge of the facts hereinafter stated.

**EXHIBIT 1**

2. I have investment property which I visit from time to time at 2186 N. Starr Road, Palm Springs, California 92262.

3. That investment property includes a studio where I do some of the set designing and logistical pre-Tour work.

4. I often travel with my clients as they go on Tour throughout the world and within the United States. Some of my non-touring time is spent at my investment property and the studio in Palm Springs, California preparing and designing for the next Tour.

5. I was part of a team of individuals who designed the separate and distinct sets and the separate accused infringing use of curtains, lifting and collection mechanisms for the curtains, graphics and lighting systems for the Litigation Defendants.

6. For the design of the set and the accused infringing system as well as providing the tour logistics needed for the BSpears Defendants, I worked for an entity known as: Roadrage Group, LTD of London England.

7. For the design of the set and the accused infringing system as well as providing the tour logistics needed for the JTimberlake Defendants, I was an employee of the JTimberlake Defendants.

8. For the JSpears Defendants, the singular circular curtain, the mechanism for hoisting, holding and lifting of the curtain, and the set of non-video, non-photographic projecting lights, known in the industry as VL3000s, which provide static (non-moving) light images directed onto the outside of the round curtain, these were provided by SoloTech, an entity of Montreal, Canada with offices in California and Las Vegas. This seems to be the system accused as an infringement of the Patent mentioned in the Complaint in the captioned litigation.

9. The graphics used for the BSpears Tour System were partially designed by an entity in Belgium and the other parts designed by an entity in Hollywood, California.

10. Some of the meetings, consultations, and designing of the BSpears Tour System with the BSpears Defendants and the entities which designed and implemented the accused infringing system were held in Los Angeles, California.

11. For the JTimberlake Defendants, the partial curtains, mechanism for hoisting, holding and lifting of the curtains, video, images and graphics projected onto the curtains (hereinafter "the JTimberlake Tour System") which seems to be accused as infringing upon LADS' Patent (the Patent set forth in the Complaint in the captioned litigation) mechanical components were designed and provided by Eric Pierce whose business is based in Las Vegas and in Los Angeles. I consulted with Pierce in Los Angeles in connection with the design of the JTimberlake Tour System.

12. The video content for the JTimberlake Tour System was designed in Montreal, Canada by Geodizk (a/k/a VYV Corp). They provided the servers, too, for projecting the video content onto the curtains.

13. The projectors and curtains used for the JTimberlake Defendants' shows were provided by Screen Works and Danny O'Bryen of North Hollywood California.

14. Some of the meetings, consultations, and designing of the JTimberlake Tour System with the JTimberlake Defendants and the entities which designed and implemented the accused infringing system were held in Los Angeles, California.

15. Some of the meetings with the BSpears Defendants which we attended for the purposes of designing the set and for the logistics of the tours were held in Los Angeles, California.

16. Some of the meetings with the JTimberlake Defendants which we attended for the purposes of designing the set and for the logistics of the tours were held in both Las Vegas and Los Angeles, California.

17. Substantially all of the documents and sketches, design concepts, discussion memorandum relating to the set designs for the BSpears Defendants and the BSpears Tour System are maintained by me on my portable laptop which travels with me.

18. Substantially all of the documents and sketches, design concepts, discussion memorandum relating to the set designs for the BSpears Defendants and the JTimberlake Tour System are maintained by me on my portable laptop which travels with me.

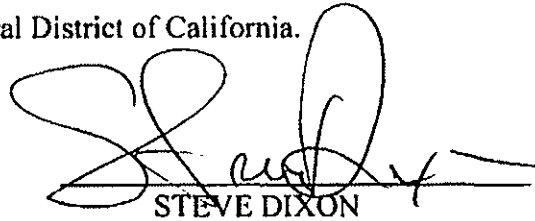
19. Due to my tour travelling commitments it is likely to be more convenient for me to produce documents, to have my deposition taken and to attend a Trial in the captioned litigation if the case were transferred to and held in California than in the Eastern District of Texas.

20. It would seem to likely advance thorough and complete discovery of relevant information to the BSpears Tour System and the JTimberlake Tour System if the discovery in the captioned case and trial were held in the location of some of my service and goods suppliers for the BSpears Tour System and the JTimberlake Tour System. Some of the relevant individuals have offices and reside or frequent California and, to my knowledge, none of them have any offices within the Eastern District of Texas nor within 100 miles of the Eastern District of Texas.

21. As indicated, I fly around the world and the United States and I find Los Angeles to be convenient for my professional life.

22. Some of the suppliers of the components of the BSpears Tour System and the JTimberlake Tour System are likely more conveniently found for discovery, production of documents, and trial in California than in the Eastern District of Texas.

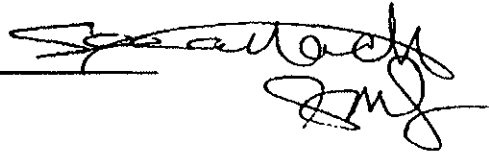
WHEREFORE, for the reasons stated herein, I respectfully request that this Court transfer the above-captioned action to the Central District of California.



STEVE DIXON

Sworn to before me this  
\_<sup>th</sup> day of \_\_\_\_\_, 2010

\_\_\_\_\_  
Notary Public



### ACKNOWLEDGMENT

State of California  
County of Riverside

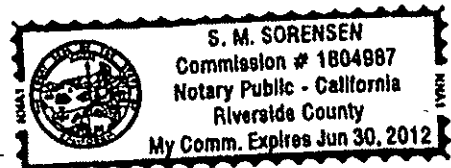
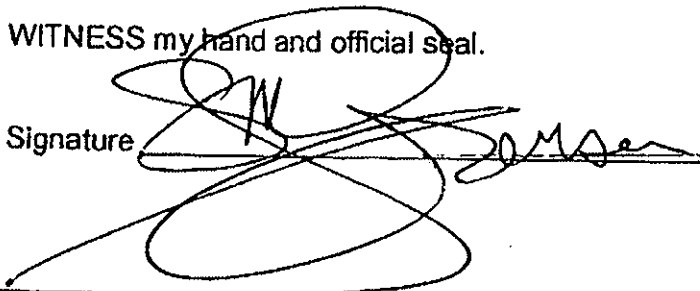
On 3-11-2010 before me, S. M. Sorensen Notary Public  
(here insert name and title of the officer)

personally appeared Steven Dixon

personally known to me (or proved to me on the basis of satisfactory evidence) to be  
the person(s) whose name(s) is/are subscribed to the within instrument and  
acknowledged to me that ~~he~~/she/they executed the same in his/her/their authorized  
capacity(~~ies~~), and that by his/her/their signature(s) on the instrument the person(s)  
or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature



(Seal)

